

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CATRINA WILSON,

Plaintiff,

Case No: 2:22-cv-12098

HON:

vs.

RAIM ASLANOV,
SAFARI EXPRESS, INC., and
ARSENAL CARRIER, INC.,

Defendants.

STEVEN R. ZANG (P45095)
MATTHEW M. THOMAS (P78740)
LUXON & ZANG, P.C.
Attorneys for Plaintiff
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TARA S. CANNATELLA (P67532)
HUTCHINSON CANNATELLA, P.C.
Attorneys for Defendants
1001 Woodward Ave., Suite 900
Detroit, MI 48226
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**NOTICE OF REMOVAL BASED UPON
DIVERSITY OF CITIZENSHIP**

NOW COME the Defendants, **RAIM ASLANOV AND SAFARI EXPRESS, INC.**, by and through their Attorneys, **HUTCHINSON CANNATELLA P.C.**, and remove this action from the 3rd Judicial Circuit Court, State of Michigan, to the United States District Court for the Eastern District of Michigan, Southern Division, and in support thereof state:

1. Plaintiff filed her Complaint on or about March 22, 2022 and claimed that she was seriously injured in a motor vehicle accident that occurred on March 22, 2019.

2. According to Plaintiff's Complaint, Plaintiff suffered a serious impairment of an important body function that exceed the jurisdictional limit of this Court, including:

a. Injuries to her neck, back and spine;

- b. Disc herniations in the cervical spine at C2-C3, C5-6 and C6-7;
- c. Disc herniations in the lumbar spine at L3-4 and L4-5;
- d. Psychological and emotional injuries.

3. Plaintiff served a copy of her Complaint upon Defendants Aslanov and Safari Express through their attorney on August 15, 2022. A copy of the Plaintiff's Complaint is attached hereto as Exhibit A and incorporated herein by reference.

4. Plaintiff, at this time and at the time of the filing of her Complaint, claims to be a citizen of the State of Michigan.

5. Defendant Raim Aslanov was at the time of the filing of the Complaint and is now a citizen of the State of Georgia.

6. Defendant Safari Express, Inc. was at the time of the filing of the Complaint and is now a Georgia corporation with its principle place of business in the State of Georgia.

7. Defendant Arsenal Carrier, Inc. was at the time of the filing of the Complaint and is now an Illinois corporation with its principle place of business in the State of Illinois.

8. The amount in controversy exceeds \$75,000, exclusive of interest and costs.

9. This Court has original jurisdiction under 28 USC Section 1332(a)(1) because this is an action between citizens and a corporation of different states and based upon Plaintiff's claimed damages, the matter in controversy exceeds \$75,000, exclusive of interest and costs.

10. A copy of this Notice of Removal is being simultaneously filed with the 3rd Judicial Circuit Court, State of Michigan, as required by 28 USC Section 1446(d).

11. Defendants are entitled to remove this action to this Honorable Court under 28 USC Section 1441.

12. Concurrence and consent to the removal was granted by Arsenal Carrier, Inc.

HUTCHINSON CANNATELLA P.C.

By /s/ Tara S. Cannatella

TARA S. CANNATELLA (P67532)

Attorney for Defendants

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Dated: September 1, 2022

HUTCHINSON CANNATELLA P.C.
1001 WOODWARD, SUITE 900 □ DETROIT MICHIGAN 48226 □ (313) 963-1860

CERTIFICATE OF SERVICE

Tara S. Cannatella, being first duly sworn, deposes and says that on September 6, 2022 she served a copy of Notice of Removal via email upon the following:

STEVEN R. ZANG (P45095)
MATTHEW M. THOMAS (P78740)
LUXON & ZANG, P.C.
Attorneys for Plaintiff
29777 Telegraph Rd, Ste 2631
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(248) 358-9909 / Fax: 358-5646
mthomas@luxonzangpc.com

I declare the above statements are true to the best of my knowledge, information and belief.

HUTCHINSON CANNATELLA P.C.

By /s/ Tara S. Cannatella
TARA S. CANNATELLA (P67532)
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tcannatella@mhutchlaw.com

Dated: September 1, 2022
Ntc of Removal 09-06-22

HUTCHINSON CANNATELLA P.C.
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